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### *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH; *et al.*

## Plaintiffs,

VS.

RYAN CARROLL; *et al.*

### Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**STIPULATION TO STAY  
SPECIALLY APPEARING  
DEFENDANTS TROY  
MARCHAND AND QUANTUM  
ECOMMERCE'S TIME TO FILE A  
RESPONSIVE PLEADING  
PENDING PLAINTIFFS'  
FORTHCOMING SECOND  
AMENDED COMPLAINT**

Presiding Judge: Hon. Wesley L. Hsu  
Trial Date: N/A

**STIPULATION TO STAY DEFENDANTS TROY MARCHAND AND  
QUANTUM ECOMMERCE'S TIME TO FILE A RESPONSIVE PLEADING  
PENDING PLAINTIFFS' FORTHCOMING SECOND AMENDED  
COMPLAINT**

1        This Stipulation is entered into by and between Plaintiffs on the one hand, and  
2 Specially Appearing Defendants Troy Marchand and Quantum Ecommerce, a  
3 dissolved corporation, on the other hand, through their respective counsel of record.  
4

5        WHEREAS, Plaintiffs have received third-party documents and intend to  
6 amend the currently operative First Amended Complaint to add new defendants and  
7 new allegations about existing defendants;  
8

9        WHEREAS, Plaintiffs require additional time to investigate entities and  
10 individuals to potentially be added as defendants, and to further investigate  
11 forthcoming new allegations about existing defendants;  
12

13        WHEREAS, Plaintiffs anticipate receiving additional discovery from Wells  
14 Fargo, Thread Bank, Bank of America, and JP Morgan—including discovery of  
15 account statements, wire transfers, and third-party-agent/payment-processor  
16 transaction data—within the next six weeks;  
17

18        WHEREAS, Plaintiffs anticipate that the new discovery, will significantly  
19 further inform Plaintiffs' allegations;  
20

21        WHEREAS, it would be most efficient—and in the interests of justice—for  
22 Plaintiffs to wait to file a second amended complaint until Plaintiffs have reviewed  
23 the forthcoming discovery that they anticipate receiving shortly;  
24

25        WHEREAS, it would also be inefficient for Specially Appearing Defendants to  
26 respond to the currently operative complaint when the parties anticipate that another  
27 amended complaint will be filed;  
28

1 IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

2 The deadline for Specially Appearing Defendants Troy Marchand and  
3 Quantum Ecommerce, a dissolved corporation, to file responsive pleadings to the  
4 current complaint should be stayed.  
5

6 Specially Appearing Defendants Troy Marchand and Quantum Ecommerce, a  
7 dissolved corporation, should be ordered to file a responsive pleading no later than 30  
8 days from the date Plaintiffs file and serve their Second Amended Complaint.  
9

10 This stipulation is made without prejudice to any party's right to seek further  
11 extensions or modifications by agreement or by order of the Court for good cause.  
12

13 IT IS SO STIPULATED.

14 Dated: July 30, 2024

15 /S/ Nico Banks  
16 Nico Banks (CA SBN:344705)  
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28 *Attorneys for Plaintiffs*

# **REICH RADCLIFFE & HOOVER LLP**

By: /S/ Richard J. Radcliffe

Richard J. Radcliffe

Marc G. Reich

Attorneys for Specially Appearing Defendants Troy Marchand and Quantum Ecommerce, a dissolved corporation

## WORD COUNT COMPLIANCE CERTIFICATION

The undersigned, counsel of record for Plaintiffs, certifies that this brief contains fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1

/s/Nico Banks  
Nico Banks  
Dated: July 30, 2024

## ATTESTATION

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Nico Banks  
Nico Banks

## **CERTIFICATE OF SERVICE**

On July 30, 2024, I served this motion and accompanying papers via first-class mail to the parties listed below with addresses below their names, and via email to the parties with email addresses below their names:

JARED DAY;  
19710 Chara Ct,  
Cypress, TX 77433

CHRISTINE CARROLL;  
11298 Snow View Ct,  
Yucaipa, CA 92399

TRAVIS MARKER; THE LAW OFFICE OF TRAVIS R. MARKER, A PROFESSIONAL CORPORATION (D.B.A. "MARKER LAW AND MEDIATION"); & PARLAY LAW GROUP A PROFESSIONAL CORPORATION  
333 2nd St.  
Suite 16,

1 Ogden, UT, 84404

2 MATTHEW CROUCH;

3 Via email to his attorney Levi Y. Silver at lsilver@swsslaw.com

4 REYHAN PASINLI & TOTAL-APPS, INC.

5 Via email to their attorney Geoffrey Brethen at gbrethen@wattslawyers.com

6 TROY MARCHAND & QUANTUM ECOMMERCE

7 Via email to their attorney Marc Reich at mgr@reichradcliffe.com

8 BONNIE NICHOLS & WHOLESALE UNIVERSE;

9 Via email to their attorney Brad Geyer at bradford.geyer@formerfedsgroup.com

10 I declare under penalty of perjury under the laws of the State of California that the  
foregoing statements in this Certificate of Service are true and correct.

11 /s/Nico Banks

12 Nico Banks

13 Dated: July 30, 2024

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